

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION

THE STATE OF ARIZONA, et al.,

PLAINTIFFS,

v.

MERRICK GARLAND in his official capacity  
as Attorney General of the United States of  
America; et al.,

DEFENDANTS.

CIVIL ACTION NO. 6:22-cv-01130

**PUBLIC DECLARATION OF MONICA BROWN**

I, Monica Brown declare as follows:

1. I am the Deputy Assistant Secretary at the Louisiana Department of Children and Family Services (“LDCFS”). I am over the age of 18, and I have personal knowledge of the facts contained in this Declaration. I could competently testify to the contents of this Declaration if called upon to do so.

2. Attached as Exhibit 140 is a true and accurate copy of B-220-FITAP Eligibility Requirement/Non-Citizen Status (effective July 1, 2022).

3. Attached as Exhibit 141 is a true and accurate copy of B-220-SNAP Eligibility Requirement/Non-Citizen Status (effective March 1, 2023).

4. In the regular and ordinary course of its activities, LDCFS creates and maintains records regarding public benefits overseen by LDCFS. Those records are created at or near the time of the associated event by – or from information transmitted by – someone with knowledge.

5. The Supplemental Nutrition Assistance Program (“SNAP” a/k/a “food stamps”) and Temporary Assistance for Needy Families Program (“TANF”) are among the public benefits overseen

by LDCFS. In Louisiana, TANF is used to fund the Family Independence Temporary Assistance Program (“FITAP”).

6. Attached as Exhibit 142 is a true and accurate summary of LDCFS records reflecting SNAP and FITAP issuances to asylees in Louisiana.

7. In Exhibit 142, the “CASE\_NUM” column identifies the case number, which generally corresponds to a family; the “PROGRAM\_CD” column identifies the program, with “FS” referencing SNAP and “TF” referencing TANF; the “ISSUANCE\_AMT” column identifies the monthly benefit amount; and the “PAYMENT\_BEGIN\_DT” identifies the date when the benefit was first issued.

8. Exhibit 142 reflects SNAP or TANF benefits being issued to 380 individuals in 223 case numbers.

9. For non-citizens applying for SNAP or FITAP, DCFS must verify the applicant’s eligibility. LDCFS employs two or three people who perform that function, generally by running the non-citizen’s name against the Systematic Alien Verification for Entitlement (“SAVE”) system administered by U.S. Citizenship and Immigration Services.

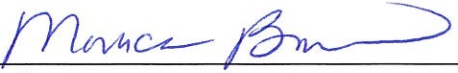
10. For non-citizens applying for SNAP or FITAP who do not speak English, LDCFS provides an interpreter. SNAP or FITAP eligibility interviews conducted through an interpreter require significantly more time than do eligibility interviews conducted in English.

11. The administrative costs for the SNAP program are split between the State of Louisiana and the federal government.

12. Further declarant sayeth naught.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA AND THE STATE OF LOUISIANA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in Baton Rouge, LA, this 22<sup>nd</sup> day of January 2024.

  
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Monica Brown  
Louisiana Department of Children and Family Services  
Deputy Assistant Secretary